

# Our Code of Conduct

**This Code provides the fundamental principles and key policies that govern the conduct of our business.**

Spellman High Voltage Electronics Corp. and its subsidiaries and offices (“The Company”) are committed to conducting business in compliance with all applicable laws, rules, and regulations and to upholding the highest standards of ethical conduct. We recognize that only by acting with honesty and integrity can we work effectively with each other and develop trusting, long-term partnerships with our customers and suppliers. Spellman and its employees will always strive to be a positive force in our communities and on the environment.

## **The Spellman Workplace**

### **Compliance with Laws and Ethical Standards**

All of Spellman’s employees, intermediaries (such as sales representatives, brokers, and agents), and business partners (such as third-party service providers, consultants, advisors, suppliers, and customers) must comply with all applicable local, national, and international laws, ordinances, and regulations, and conduct business in an ethical manner. Each of us accepts personal accountability to act with integrity and to do whatever we can to ensure that our colleagues, managers, intermediaries, and business partners act in a manner that is consistent with this Code.

### **Reporting, Investigating, and Disciplining Misconduct**

Our commitment to accountability includes the duty to report incidents of unethical or troubling conduct. Spellman makes every effort to provide an environment in which employees feel safe reporting behavior that appears to violate our ethical standards. However, we realize that there will always be some level of concern over the risk of retaliation. Retaliating against individuals who act in good faith to escalate a concern is a violation of our Code and will not be tolerated.

To allow for the reporting of ethics violations anonymously and with the highest degree of confidentiality, we have created a hotline (Syntrio Lighthouse Services). Syntrio Lighthouse Services provides toll-free numbers and other methods of reporting that are available 24 hours a day, 7 days a week. Reporting through this service can be done via email, webpage, telephone, or fax. Details on the various avenues for reporting may be found at <https://report.syntrio.com/spellmanhv>. Support is available in over 140 languages. In addition to the Ethics Hotline, employees are also able to bring issues to the attention of Management or Human Resources.

All reports are investigated and documented with the intention of developing a fair and comprehensive understanding of the events. To the extent practical and permissible by law, the Company will:

- Protect the confidentiality of the individuals involved and inform the suspected party of the accusations reported against them at a time when such a disclosure will not jeopardize the investigation.



- Allow accused employees, Intermediaries, or business partners to respond to the allegations and to provide additional information. Violations of this policy or applicable laws may result in disciplinary action, up to and including termination of employment.

### **Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates.

### **Respect and Accountability**

Spellman is committed to providing a respectful, safe, equitable, and inclusive work environment. Employees are accountable for doing their best to achieve their work-related goals, and for helping their colleagues, teams, managers, and the company achieve their goals.

### **Reasonable Accommodation**

We strive to be inclusive and will reasonably accommodate employees' religious observance and practices. The company will also provide reasonable accommodation for qualified individuals with disabilities who are otherwise able to perform the essential functions of their position. Please contact your immediate supervisor and local Human Resources department for information on the process for requesting accommodation.

### **Diversity, Equity, and Inclusion**

We believe that each individual is entitled to equal employment opportunities regardless of differentiating characteristics such as race, color, creed, religion, gender, sexual orientation, gender identity, marital status, national origin, age, veteran status, or disability. Central to Spellman's identity is its commitment to the following:

- Recruiting and developing a diverse workforce
- Establishing an equitable and inclusive work environment
- Fostering understanding and tolerance
- Identifying and seeking to eliminate systemic racism and institutional bias
- Preventing discrimination and harassment

Every employee has the right to work in a professional atmosphere and is responsible for reporting discriminatory practices and harassment of any kind. Verbal, physical, or graphic discrimination or harassment in any work-related setting (e.g., business trips, social events) is unacceptable. Any employee, intermediary, or business partner who violates Spellman's policies prohibiting discrimination, or any form of harassment, will be subject to disciplinary action, up to and including termination of employment.

### **Abuse of Power**

The company will not tolerate any employee using their position unfairly for personal gain or to intimidate, punish, or reward another person. Any actual or suspected abuse of power should be reported immediately.

### **Health and Safety**

As part of our commitment to put customers at the center of everything we do, we make workplace safety a foundational commitment that is never compromised.

Environmental and health and safety laws are complex, subject to frequent changes, and vary from country to country. Abiding by these laws exhibits a respect for the environment and each other. Employees should seek



the advice of an appropriate Environmental, Health, Safety, and Security (EHSS) employee about the application of these laws and compliance with Spellman's policies, which may be more stringent than applicable laws.

Safety and quality form the foundation on which our business is built. All employees of Spellman are responsible for the safety and well-being of themselves and their co-workers. Any hazardous or unsafe observations must be reported immediately to your supervisor or safety officer. More information is available in Spellman's EHSS Policy. *SAFETY. IT'S PERSONAL. OWN IT.*

## **Corporate Responsibility and Sustainability**

### **Sustaining the Environment**

Spellman strives to comply with industry best practices and international standards aimed at minimizing the environmental impact of its operations, products, and services, and to promote environmental awareness and good practices among its employees, intermediaries, and business partners. To achieve this, Spellman employees will:

- Comply with all relevant environmental legislation and regulations
- Support the environmental goals of the company
- Comply with and report violations of corporate environmental policies
- Suggest improvements to reduce environmental impact

### **Responsible Sourcing**

The Company will comply with industry best practices and international standards for labor, health, and safety to ensure sourcing from vendors that practice:

- Freely chosen employment: no vendor or its suppliers may use forced or indentured labor, involuntary prison labor, slave labor, or victims of trafficking
- No child labor in any stage of manufacturing
- Compliance with occupational safety, emergency preparedness, and safe and healthy workplace requirements
- "Conflict-free" responsible mineral sourcing
- Compliance with environmental regulations including obtaining permits, reporting metrics, preventing pollution, protecting against adverse effects on the community, and improving energy efficiency

### **Philanthropy and Social Responsibility**

Spellman supports both individual and group participation of employees in projects and initiatives that improve quality of life in local communities.

## **Safeguarding Our Assets and Information**



### **Maintaining Financial Books and Records**

Accurate and complete financial records and reports are both legal requirements and critical sources of information for successful management of the company. A list of these records and reports includes but is not limited to financial statements, tax returns, expense reports, time sheets, reporting of paid or unpaid time off,

payroll and service records, bills, equipment orders, invoices, and other financial data such as might be submitted to company auditors or government agencies.

We do not allow undisclosed or unrecorded company funds (such as “off the books” accounts) for any purpose. Employees and intermediaries must never sign another's name or sign on behalf of anyone other than themselves, unless authorized by such individual to do so.

### **Protecting Personal Information**

We respect the privacy of our employees, customers, intermediaries, and business partners. We are committed to the protection and appropriate use of the personal information we have been entrusted with and have documented our policies and practices in the Spellman Privacy Policy and General Data Protection Regulation (GDPR) Privacy Notice for Employees.

### **Protecting Confidential Business Information**

Protection of confidential and propriety information is essential to Spellman’s success and to maintaining the trust of our customers. Employees are required to sign appropriate local Confidentiality, Non-Solicitation and/or Non-Competition agreements at the onset of their employment; and further, as a condition of continued employment, employees may be required to periodically update Confidentiality, Non-Solicitation and/or Non-Competition agreements in accordance with relevant law.

### **Protecting Company Resources**

Company resources must only be used for legitimate business purposes and/or in accordance with the relevant policy. Employees are responsible for the protection of both physical and intangible resources from theft, loss, damage, and misuse. Physical resources include facilities, supplies, equipment, machinery, products, and all of their components, as well as company funds. Intangible resources include, but are not limited to company time, labor, confidential information, intellectual property, and information systems.

### **Financial Resources**

Employees, Intermediaries, and business partners always:

- Ensure that company funds are used for their proper purpose
- Obtain required approval before incurring expenses
- Accurately record expenditures
- Verify that expenses submitted for reimbursement are business-related

### **Information Technology**

Employees and business partners are responsible for protecting Company computer hardware, software, and data by observing good security practices, treating them with care, and adhering to all related company policies.



## **Competing Fairly**

### **Conflicts of Interest**

All employees, intermediaries, and business partners should be aware of the potential for conflicts of interest and carefully consider not only the intent, but also how others might interpret our behavior. A potential conflict of interest arises when an employee, intermediary, or business partner has a private interest that could interfere, in any way, with the interests of the company. Conflicts of interest can include any personal situation or relationship that might influence the judgement of someone entrusted with the authority to act on behalf of the company. In the event of a potential conflict of interest, employees and/or business partners must notify either the senior management at their local Spellman site or file a report through Syntrio Lighthouse Services at <https://report.syntrio.com/spellmanhv>.

Support is available when potential or actual conflicts of interest arise, and because such situations can be complex, it is often best to consult with senior leadership.

### **Fair Competition**

Spellman has a long-standing commitment to conduct business fairly and honestly. It is our policy and intent to always comply with all applicable anti-trust and unfair competition regulations. We prohibit any behavior that could be reasonably construed as collusion, bribery, fraud, or false reporting of misconduct. Any violations or requests to violate these principles should be reported to site or corporate leadership.

Because competition and anti-corruption regulations are complex and vary by jurisdiction, professional advice may at times be necessary to determine whether specific actions violate such laws.

In general, we expect employees and business partners to:

- Exercise sound judgement, seeking counsel when appropriate
- Avoid formal or informal agreements with competitors on sensitive topics such as prices, margins, business plans, trade programs, discounts, and production capacity
- Ensure that we do not offer or accept gifts of any sort that might influence or appear to influence business decisions inappropriately
- Maintain honesty and accuracy in all records that the company and its stakeholders might rely on when making decisions, including, but not limited to working time records, quality information, employment applications, financial information, and payment records
- Support any internally or externally conducted audit or investigation of business practices by appropriately maintaining and providing records

### **No Rights Created**

This Code is a statement of the fundamental principles that govern the conduct of the company's business. It is not intended to, and does not, create any obligations to or rights in any employee, client, supplier, competitor, shareholder, or any other person or entity.

### **The Syntrio Lighthouse Services Hotline**

*Have an issue?* If you can't speak with a supervisor, a member of the Spellman Management team, or Human Resources, please use the Syntrio Lighthouse Services hotline, which is available 24 hours a day and seven days a week at: <https://report.syntrio.com/spellmanhv>.